

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

KELLY A. TILLEY, as Personal  
Representative of the Estate of  
DANA ANDREW TILLEY, Deceased,

Plaintiff,

VS.

Civil Action No.06-00513-KAJ

PFIZER INC., PARKE-DAVIS, a division  
of Warner-Lambert Company and  
Warner-Lambert Company LLC,  
WARNER-LAMBERT COMPANY and  
WARNER-LAMBERT COMPANY LLC,

**Defendants.**

**STIPULATION AND (PROPOSED) ORDER  
TO STAY PROCEEDINGS PENDING MDL TRANSFER**

Plaintiff, Kelly A. Tilley, as personal representative of the Estate of Dana Andrew Tilley, and Defendants Pfizer Inc. and Warner-Lambert Company LLC, successor to Warner-Lambert Company LLC, on its own behalf and on behalf of its unincorporated division, Parke-Davis (collectively, the “Parties”), by their undersigned counsel, hereby stipulate and agree as follows:

1. The relief sought by Defendants in their Motion to Stay Proceedings Pending MDL Transfer filed on August 31, 2006 is now unopposed and shall therefore be deemed granted; and
2. All pretrial activity in this case, including, but not limited to, any and all motions challenging this Court's jurisdiction or to remand, if any, the deadline set forth in the

Court's letter to counsel dated August 30, 2006 and any other discovery and pretrial deadlines, shall be stayed pending transfer of this case to *In re Neurontin Marketing, Sales Practices and Products Liability Litigation*, MDL Docket No. 1629, for coordinated and consolidated pretrial proceedings.

Respectfully submitted,

/s/ L. Vincent Ramunno  
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IT IS SO ORDERED this 13<sup>th</sup> day of Sept., 2006.

  
The Honorable Kent A. Jordan